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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

TALIA WAGNER, an individual; THOMAS  
WAGNER, an individual,

Plaintiff,

v.

SYNCHRONY BANK, a national banking  
association; EXPERIAN INFORMATION  
SOLUTIONS, INC., a foreign corporation,

Defendant.

Case No. 2:20-cv-01596-GMN-BNW

**JOINT MOTION AND ORDER FOR  
EXTENSION OF TIME FOR  
SYNCHRONY BANK TO RESPOND TO  
PLAINTIFFS' COMPLAINT**

Plaintiffs Talia and Thomas Wagner ("Plaintiffs") and Defendant Synchrony Bank ("Synchrony"), by and through their respective counsel of record and pursuant to Local Rule IA 6-1, jointly move for an extension as follows:

**STATEMENT OF JOINT MOTION**

WHEREAS, Plaintiffs filed a Complaint on August 28, 2020;

WHEREAS, Synchrony was served with the Complaint on September 8, 2020;

WHEREAS, Synchrony's response to the Complaint is due by September 29, 2020;

WHEREAS, Synchrony needs additional time to research the allegations set forth in the Complaint and prepare a response to the Complaint;

WHEREAS, counsel for Synchrony Bank has corresponded with counsel for Plaintiffs, who agrees to this extension;

WHEREAS, this Joint Motion is filed in good faith and not for dilatory or other improper purpose. Plaintiffs would not suffer any prejudice by this Court permitting Synchrony the requested extension of time and has consented to the requested extension;

1 WHEREAS, this is the first request for extension of time for Synchrony to respond to the  
2 Complaint;

3 WHEREAS, Plaintiffs and Synchrony hereby agree that the deadline for Synchrony to  
4 respond to the Complaint is extended to October 14, 2020.

5  
6 Dated: September 28, 2020

**LAW OFFICE OF KEVIN L. HERNANDEZ**

7 By: /s/ Kevin L. Hernandez  
8 Kevin L. Hernandez  
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*Attorney for Plaintiffs Talia and Thomas Wagner*

15  
16 Dated: September 28, 2020

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*Attorneys for Defendant Synchrony Bank*

25 **IT IS SO ORDERED**

26 **DATED:** 12:04 pm, October 05, 2020

27  
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**BRENDA WEKSLER**  
**UNITED STATES MAGISTRATE JUDGE**